

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HI JI,

LI MINJUN,

TU LAN,

ZHU FENG,

also known as “Johnny Zhu,”

KUANG ZEBIN,

also known as “Vincent Kuang,”

MICHAEL MCMAHON,

ZHAI YONGQIANG,

ZHENG CONGYING and

ZHU YONG,

also known as “Jason Zhu,

Defendants.

Case No. 1:21-cr-00265 (PKC) (S-1)

**NOTICE OF MOTION FOR  
DISCOVERY AND AN EVIDENTIARY  
HEARING REGARDING  
PROSECUTORIAL MISCONDUCT**

*Filed Electronically*

**TO:** All Counsel of Record

**PLEASE TAKE NOTICE** that, Defendant, Michael McMahon, by and through his counsel, Gibbons P.C. (Lawrence S. Lustberg, Esq. and Genna A. Conti, Esq. appearing), shall move before the Honorable Pamela K. Chen, United States District Judge for the Eastern District of New York, at 225 Cadman Plaza East, Brooklyn, New York 11201, on a date to be set by the Court, for the entry of an Order granting Defendant Michael McMahon’s Motion for Discovery and an Evidentiary Hearing Regarding Prosecutorial Misconduct.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, defendant Michael McMahon shall rely upon the accompanying Brief in Support Defendant Michael McMahon’s Motion for Discovery and an Evidentiary Hearing Regarding Prosecutorial Misconduct;

Certification of Lawrence S. Lustberg, Esq., and accompanying exhibits; Certification of Defendant Michael McMahon; Certification of Mary Martha McMahon; and Certification of Michael T. McMahon, all filed herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is respectfully requested.

Dated: August 8, 2022

Respectfully submitted,

s/Lawrence S. Lustberg

Lawrence S. Lustberg

Genna A. Conti

**GIBBONS P.C.**

One Gateway Center

Newark, New Jersey 07102

Tel: (973) 596-4500

Fax: (973) 596-0545

llustberg@gibbonslaw.com

*Attorneys for Defendant Michael McMahon*